

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

STEFANO GRANATA; JUDSON THOMAS;  
COLBY CANNIZZARO; CAMERON PROSPERI;  
THE GUN RUNNER, LLC; and FIREARMS  
POLICY COALITION, INC.,

Plaintiffs,

v.

MAURA HEALEY, in her official capacity as  
Attorney General of the Commonwealth of  
Massachusetts; and THOMAS TURCO, in his  
official capacity as Secretary of Executive Office of  
Public Safety and Security of the Commonwealth of  
Massachusetts,

Defendants.

CIVIL ACTION  
NO. 1:21-cv-10960-RWZ

**DEFENDANTS' MOTION FOR LEAVE TO FILE  
REPLY MEMORANDUM IN SUPPORT OF MOTION TO DISMISS**

Pursuant to Local Rule 7.1(b)(3), Defendants Maura Healey, Attorney General of the Commonwealth, and Thomas Turco, Secretary of Executive Office of Public Safety and Security of the Commonwealth, respectfully move for leave to file a reply memorandum in further support of their motion to dismiss the amended complaint. As grounds, the Defendants state:

1. Plaintiffs filed a Complaint on June 8, 2021. The Complaint asserts one count under the Second Amendment to the U.S. Constitution against Defendants in their official capacities.
2. On August 20, 2021, Defendants filed a Motion to Dismiss the Complaint and memorandum in support of that motion. The Plaintiffs filed a Memorandum in Opposition to the Motion to Dismiss on September 17, 2021.

3. The Defendants believe that a seven-page reply memorandum, in the form attached to this motion as Exhibit A, will assist the Court in reaching a full and fair decision on the motion to dismiss.

4. Counsel have conferred regarding this motion pursuant to Local Rule 7.1, and Plaintiffs' counsel has stated that Plaintiffs take no position on the filing of this motion.

WHEREFORE, the Defendants respectfully request that the Court grant this Motion for Leave to File a Reply and accept for filing the reply brief attached as Exhibit A.

Respectfully submitted,

MAURA HEALEY, ATTORNEY GENERAL,  
and SECRETARY THOMAS TURCO,

By their attorneys,

/s/ Phoebe Fischer-Groban

Phoebe Fischer-Groban, BBO No. 687068

Grace Gohlke, BBO No. 704218

Assistant Attorneys General

Office of the Attorney General

Government Bureau

One Ashburton Place, 20th Floor

Boston, MA 02108

(617) 963-2589

Phoebe.Fischer-Groban@mass.gov

Grace.Gohlke@mass.gov

Dated: October 8, 2021

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)**

I certify that, on September 23, 2021, I conferred by email with Ray DiGuiseppe, counsel for the Plaintiffs, and attempted in good faith to reach agreement on this motion. He indicated that the Plaintiffs take no position on this motion.

/s/ Phoebe Fischer-Groban

Phoebe Fischer-Groban

Assistant Attorney General

**CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 8, 2021.

/s/ Phoebe Fischer-Groban

Phoebe Fischer-Groban

Assistant Attorney General